

## **ACWD COMMENTS**

### **CALFED BAY-DELTA SCOPING MEETING**

**Oakland**

**April 9, 1996**

My name is Karl Stinson. I am the Operations Manager for the Alameda County Water District. ACWD serves drinking water to 280,000 residents of the southeastern San Francisco Bay Area. The State Water Project supplies more than half of the water served to its customers. ACWD also imports another 30 percent of its supplies from the San Francisco Hetch-Hetchy system.

ACWD is also a member of the California Urban Water Agencies and supports CUWA's principles for the Bay-Delta solution. Rather than reiterate all of CUWA's principles, I will focus my comments tonight on critical CUWA principles as they relate specifically to ACWD.

### **DRINKING WATER QUALITY**

A critical issue for ACWD is drinking water quality and the protection of public health.

Each year new constituents of health concern in drinking water are identified. The number of constituents regulated is increasing dramatically. Since 1960, by decade, the number of constituents regulated has increased from 11 to 21 to 50 to 83 to 183 in the year 2000. EPA is now assessing new pathogen and disinfection byproduct drinking water standards and is about to release its Information Collection Rule designed to provide information needed to set additional standards. Stage 1 of the disinfection byproducts standards have already been established and are to go into effect in a few years. Stage 2 disinfectant byproducts standards will make Stage 1 requirements even more restrictive and add additional regulatory requirements.

I appreciate the opportunity to comment tonight and we will also submit written comments for your consideration. Thank you.

## **WATER SUPPLY AVAILABILITY/RELIABILITY**

The second issue that I will address is water supply availability and reliability.

ACWD recently completed an integrated resources planning study to develop a long-term water resources plan. The plan identifies a supply shortfall of 46,000 AF/yr during critically dry years by the year 2030. This assumes that customers, after implementation of an aggressive water conservation program, will cut their demand by an additional 10% during critically dry years.

The plan calls for the implementation of several local projects to reduce ACWD's dependency upon imported supplies. Projects to be implemented include demand management, desalination of brackish groundwater, wastewater reclamation, and additional storage to bank water in wet years for use in dry years. These projects are expected to cover over half of the identified shortfall. Thus, even with the local projects, ACWD will still need to improve the current availability/reliability of its existing imported supplies. Specifically, ACWD needs to receive 65% of its entitlements from the State Water Project and San Francisco supplies during critically dry years (this compares to the 30% allocation during 1991 during the most recent drought).

## **WATER SUPPLY VULNERABILITY**

The last issue I will address tonight is water supply vulnerability.

The Delta provides more than 50% of ACWD's water supply. To ensure that ACWD can provide a continuous supply to its customers, it is essential that there be no long term interruptions in this supply. To this end, the Delta supply must be protected from major seismic events which could inundate much of the Delta with high salinity water. To avoid unreasonable demand reductions which would cause severe economic hardships, it is important for the Bay-Delta solution to assure outages of the Delta supply of no more than 6 months. This scenario would require that Lake Del Valle, the only storage on the South Bay Aqueduct, be drawn down to its minimum pool which also has environmental and recreational impacts.

To assure its customers a high quality drinking water supply, ACWD has already invested in state-of-the-art treatment technology to deal with the quality of water exported from the southern Delta. Our new 28 mgd ozonation-biological filtration treatment facility cost \$47 million.

Yet, ACWD's state-of-the-art treatment facility may not meet the Stage 1 disinfection byproduct standards to go into place in a few years. For example, bromate levels in our treated water periodically exceed the proposed Stage 1 standard for bromate. Plus, maximum contaminant levels for bromate and other brominated disinfection byproducts, due to their health risks, are expected to be lowered considerably in the Stage 2 regulations.

The production of these in our treatment plant is the direct result of the poor bromide and total organic carbon quality of our existing Delta supply. The only options left for drinking water utilities like ourselves is to find a higher quality source or invest in unproven and extremely expensive emerging technologies, such as GAC and membrane filtration. These technologies may or may not satisfy new drinking water standards and have their own environmental impacts such as hazardous waste disposal issues and high energy consumption.

In summary, when evaluating alternatives for Bay-Delta solutions including drinking water supply sources, the alternative selected should include the highest quality source reasonably available. This long-standing sanitary engineering principle has proven invaluable over time to assure protection of public health as drinking water standards increase in number and become more stringent. With respect to the Delta, with its bromide levels and peat soils and their negative impact on water quality, this means that significant improvement in the inorganic and organic quality of diversions for drinking waters is needed to assure the likelihood that future public health standards can be met. To that end, CUWA agencies are currently working on specific water quality criteria which can be used by CALFED staff as a criteria for the selection of the preferred alternative. This information will be provided to CALFED before the end of the scoping process.